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Centers for Disease Control and Prevention

Food and Drug Administration
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US Environmental Protection Agency
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Ref.: President's Council on Food Safety Strategic Planning Process and The Plan;
Federal Register/ Vol. 64, No. 116/ June 17, 1999

The comments herein are provided by the state and local agency representatives of the Information Sharing and Data Collection (ISDC) Workgroup of the integrated National Food Safety System (NFSS) project.

The ISDC Workgroup is one of six workgroups which have been actively engaged since December, 1998, in developing specific proposals and recommendations for the integrated national food safety system of the United States. The workgroups, as well as a coordinating committee with overall responsibility for review and guidance, include representatives of the US Department of Agriculture (USDA), the Food and Drug Administration (FDA) and Centers for Disease Control (CDC) of the Department of Health and Human Services (HHS), and the EPA, in addition to state and local food safety officials.

The President's Council on Food Safety was established by Executive Order dated August 25, 1998. Section 2 of the Order establishes that "The purpose of the Council shall be to develop a comprehensive strategic plan for Federal food safety activities...", while Section 3 states, "The principal goal of the plan shall be the establishment of seamless science-based food safety system." The necessity to consult, coordinate, and cooperate with state and local agencies is emphasized throughout the Order.

The Council is also directed in Section 2 of the Executive Order, to take into consideration the recommendations of the National Academy of Sciences (NAS) 1998 report "Ensuring Safe Food from Production to Consumption." While the purpose of this report is to address the role of Federal agencies in a food safety system, the report recognizes that the "roles of state and local government entities are equally critical." This concept is presented in conjunction with Recommendation IIIb of the NAS Report, specifically, "Congress should provide the agency responsible for food safety at the federal level with the tools necessary to integrate and unify the efforts of authorities at the state and local levels to enhance food safety."

The President's Council of Food Safety has subsequently stated in its July 1, 1999, Assessment of the NAS Report and Recommendation IIIb, that the roles of State, Federal, and local governments are critical and that, when combined in an integrated program, would significantly enhance food safety capabilities. Such conclusions are the basis for the current joint efforts by

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HHS [FDA and CDC], USDA, and EPA and state and local officials on the integrated National Food Safety System project and the ISDC Workgroup.

The members of the ISDC Workgroup are supportive of the efforts by the President's Council on Food Safety toward development of a comprehensive food safety strategic plan. The five food safety goals published in the July 17, 1999, Notice provide a viable framework for the food safety strategic plan. However, we have a significant concern that two essential strategic elements are missing in the proposed goals. We believe it essential to expressly identify the following two elements in the Strategic Planning process.

One missing element is information sharing among the entities engaged in food safety work at the federal, state, and local level. The effective sharing of surveillance, investigative, and other related data as it is gathered by any or all food safety agencies is equally as essential to the fabric of a seamless food safety system as is the farm to table dimension. Integral to any goal related to information sharing is the concept of information technology as a rapid communication medium.

The second element which should be specifically recognized in the strategic planning frame work is the role of laboratory capacity in the food safety system. Improvement of laboratory capacity, including standardization of methodologies for acceptance of results between agencies is an important component in the strategic planning process.

The ISDC is presently engaged in several initiatives which should enhance an integrated national food safety system. We are collaborating with the Laboratory Operations and Coordination workgroup on a nine laboratory pilot project associated with E. coli O157:H7 isolates. We will also be engaged in constructing a data matrix from information gleaned from federal, state, and local food safety agency information databases. We are also studying data standards, messaging standards, and meta databases to identify possible I.T. linkages. Finally, we have discussed other pilot I.T. projects associated with regulatory and epidemiological initiatives. These investments by state, local and federal agencies should be considered essential ingredients in any federal Strategic Planning process.

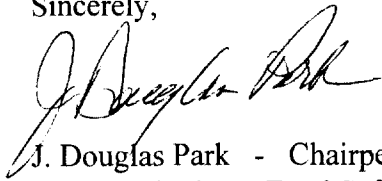
Many positive steps toward strengthening the nation's food safety system have occurred since the January 25, 1997, directive by the President for the USDA, the HHS, and the EPA to work with the states, and others, to improve the safety of our food supply. The formulation of strategic planning goals for the Council on Food Safety is a logical next step.

In summary, our recommendation regarding the current draft goals is that either an additional goal be added or that current language be modified to specifically reference the concepts of expanded collaboration of federal agencies with state and local counterparts through information sharing; the implementation of appropriate information technology to enhance information sharing; and utilization of laboratory capacity at the state and local level as a means of improving the food safety system. The members of the ISDC Workgroup believe these concepts are essential elements of a national food safety system Strategic Plan.

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We are most appreciative for the opportunity to submit our comments on this matter.

Sincerely,



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